

Remarks/Arguments

The Examiner is thanked for the careful review of this Application. Claims 1-20 are pending after entry of the present Amendment.

Rejections under 35 U.S.C. § 102:

The Office has rejected claims 1-20 under 35 U.S.C. 102(e) as being anticipated by United States Patent No. 6,549,918 to Probert, Jr. et al. ("Probert"). It is respectfully submitted that Probert fails to disclose each and every element of the claimed invention, as defined in independent claims 1, 5, 10, and 16, for at least two reasons.

First, Probert discloses a filter driver that is defined on the I/O node as well as the consumer node for intercepting a request sent by a program, retrieving the requested portions of the file in the second format, and converting the portions of the file in the second format to the first format. Thus, Probert uses the same type of component on both nodes to perform the same type of functions. The claimed invention, however, includes two different components, a driver and a translator layer each of which performs a different function. In the claimed invention, the driver is included in the consumer node, alone, while the translator layer is included in the I/O node. In fact, Probert discloses that if a single filter driver is used, the single filter driver should only be used on the server, as opposed to the claimed invention wherein the driver is included in the consumer node. See Probert, column 8, lines 30-35. In the latter scenario, however, the filter driver in Probert cannot supplement the request before transporting the supplemented request to the I/O node because the filter driver is only included in the I/O node.

Second, in the claimed invention, the requests issued by the program in the first file system are supplemented by the driver and are then transported over the transport to the I/O node. The supplemented requests carry and reveal the type of the consumer node file system to the I/O node. At this point, the translator layer residing on the I/O node can determine the type of the supplemented request and map the supplemented request to the second format. In contrast, the consumer node filter driver disclosed in Probert does not supplement the requests because the same filter driver intercepts the requests, retrieves the second file system format, and converts the request formats. In short, in Probert, the functions of intercepting, retrieving, and converting are performed by the same filter driver on the same node. Thus, the file system type of the consumer node is not being provided to another unknown node

(i.e., the I/O node) to be converted. As such, the consumer node need not provide the residing file system type to itself.

Yet further, in the claimed invention, the translator layer analyzes and determines the type of the consumer node file system and then maps the supplemented requests from the first file system to the second file system. Probert, however, is silent as to the filter driver analyzing and determining the residing file system type. As previously stated, the first file system and the filter driver both reside on the consumer node. As such, the filter driver need not inquire as to the properties of its resident file system. Thus, Probert fails to disclose each and every feature of the claimed invention, as claimed in independent claim 1.

In a like manner, Probert fails to disclose each and every feature of the claimed invention, as defined in independent claims 5 and 16 for several reasons. For instance, Probert does not disclose performing discovery of the desired I/O node, enumerating the I/O node, enumerating devices connected to the I/O node, communicating a read request to a particular device of the enumerated devices associated with the desired I/O node, and supplementing the read request for communication over the nexus. Additionally, Probert fails to disclose determining the type of the consumer node to have a first file system, loading the metadata of the second file system at the I/O node, and mounting using the reformatted metadata by the consumer node, as disclosed in claim 16. As described in more detail with respect to independent claim 1, in contrast to the claimed invention, Probert does not load the metadata of the second file system on the I/O node and mount the reformatted metadata by the consumer node. Rather, the loading and conversion occurs on the same node (i.e., the consumer node).

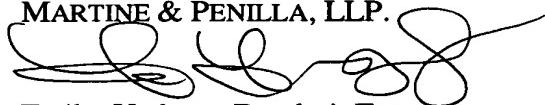
With respect to independent claim 10, it is respectfully submitted that Probert fails to disclose determining file system type of the consumer node to be a first file system, loading metadata for the second file system at the I/O node, and reformatting of the second file system at the I/O node so that the metadata of the second file system substantially matches the metadata of the first file system. It is respectfully submitted that the arguments provided above with respect to claims 1, 5, and 16 equally apply to independent claim 10.

Accordingly, independent claims 1, 5, 10, and 16 are respectfully submitted to be patentable under 35 U.S.C. § 102(e) over Probert. In a like manner, dependent claims 2-4, 6-9, 11-15, and 17-20 each of which directly or indirectly depends from the applicable independent claim are submitted to be patentable under 35 U.S.C. § 102(e) over Probert for at least the reasons set forth above regarding the applicable independent claim.

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Amdt. dated January 8, 2004  
Reply to Office action of October 8, 2003

The Applicant respectfully requests examination on the merits of the subject application, and respectfully submits that all of the pending claims are in condition for allowance. Accordingly, a notice of allowance is respectfully requested. If the Examiner has any questions concerning the present amendment, the Examiner is kindly requested to contact the undersigned at (408) 749-6900, ext. 6913. If any additional fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. INSTP002). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
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